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12 Attorneys for Plaintiff EDWIN JUAREZ individually and on
13 behalf of all others similarly situated

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EDWIN JUAREZ, individually and on behalf
of all others similarly situated,

Case No. 3:20-cv-04565-RS
Hon. Richard Seeborg

Plaintiff,
v.

SAIA MOTOR FREIGHTLINE LLC; a
Louisiana Limited Liability Company, and
DOES 1 through 50, inclusive,

**JOINT STIPULATION AND [PROPOSED]
ORDER REQUESTING VOLUNTARY
DISMISSAL PURSUANT TO FED. R. CIV. P.
41(a)(A)(ii)**

Defendants.

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12 Attorneys for Defendant Saia Motor Freight Line, LLC
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STIPULATION

Plaintiff EDWIN JUAREZ (“Plaintiff”) and Defendant SAIA MOTOR FREIGHTLINE LLC, (“Defendant”), by and through their respective counsel of record HEREBY STIPULATE AND AGREE, that pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), this action is dismissed in its entirety *with prejudice* as to Plaintiff’s individual claims against Defendant and *without prejudice* as to the putative class and putative class claims against Defendant.

IT IS SO STIPULATED.

Dated: July 28, 2021

Respectfully Submitted by
JAMES HAWKINS APLC

By: /s/ Gregory Mauro

James Hawkins
Gregory Mauro
Michael Calvo

Attorneys for Plaintiff Edwin Juarez

Dated: July 28, 2021

BRYAN CAVE LEIGHTON PAISNER LLP

By:/s/ Daria Dub Carlson

Allison C. Eckstrom
Pamela Carroll Calvet
Daria Dub Carlson

Attorneys for Defendant Saia Motor Freight
Line, LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2021 I electronically filed the foregoing with the Clerk of the Court for the U.S. District Court, for the Northern District of California using the CM/ECF system. All participants are registered CM/ECF users, and will be served by the CM/ECF system.

Dated: July 28, 2021

By: /s/ Gregory Mauro
GREGORY MAURO, ESQ.

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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
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10 EDWIN JUAREZ, individually and on behalf
11 of all others similarly situated,

12 Plaintiff,

13 v.

14 SAIA MOTOR FREIGHTLINE LLC; a
15 Louisiana Limited Liability Company, and
16 DOES 1 through 50, inclusive,

17 Defendants.
18

Case No. 3:20-cv-04565-RS
Hon. Richard Seeborg

**[PROPOSED] ORDER RE JOINT
STIPULATION REQUESTING
VOLUNTARY DISMISSAL PURSUANT TO
FED. R. CIV. P. 41(a)(A)(ii)**

1 **[PROPOSED] ORDER**

2 The Court has reviewed and considered the Joint Stipulation Requesting Voluntary
3 Dismissal Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) (the “Stipulation”) filed by Plaintiff EDWIN
4 JUAREZ and Defendant SAIA MOTOR FREIGHTLINE LLC (“Defendant”) (collectively, the
5 “Parties”). The Parties’ Stipulation requesting dismissal of this entire action with prejudice as to
6 Plaintiff’s individual claims and without prejudice as to the putative class and putative class claims,
7 shall be and hereby is GRANTED. The case is hereby dismissed in its entirety, and with prejudice
8 as to Plaintiff’s individual claims against Defendant and without prejudice as to the putative class
9 and putative claims against Defendant.

10 **IT IS SO ORDERED.**

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12 DATED: July 30, 2021

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Hon. Richard Seeborg
United States District Court Judge

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